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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,) No. 3:21-cr-00022-SLG-MMS
)
Plaintiff,) <u>COUNT 1:</u>
) <u>DRUG CONSPIRACY</u>
vs.) Vio. of 21 U.S.C. §§ 846 and
) 841(a)(1), (b)(1)(B)
MICHAEL JOSE SANCHEZ SOTO,)
and GIOVANNI JAVIER NAZARIO) <u>CRIMINAL FORFEITURE</u>
CALDERON,) <u>ALLEGATION:</u>
) 21 U.S.C. § 853(a)(1), (2), and 28
Defendants.) U.S.C. § 2461(c)
_____)

INDICTMENT

The Grand Jury charges that:

COUNT 1

Between on or about an unknown date, and on or about January 25, 2021, within
the District of Alaska, the defendants, MICHAEL JOSE SANCHEZ SOTO, and

GIOVANNI JAVIER NAZARIO CALDERON, did knowingly and intentionally combine, conspire, confederate, and agree with each other and persons known and unknown to the grand jury to distribute and to possess with intent to distribute 500 grams or more of cocaine powder.

All of which is in violation of 21 U.S.C. §§ 846 and 841(a)(1), (b)(1)(B).

CRIMINAL FORFEITURE ALLEGATION

The allegations contained in Count 1 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 21 U.S.C. § 853(a)(1) and (2) and 28 U.S.C. § 2461(c).

Upon conviction of the offense in violation of 21 U.S.C. §§ 846 and 841(a)(1), (b)(1)(B) as set forth in Count 1 of this Indictment, the defendants, MICHAEL JOSE SANCHEZ SOTO, and GIOVANNI JAVIER NAZARIO CALDERON, together and individually shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses. The property to be forfeited includes, but is not limited to, the following:

1. 2016 Lexus IS350 – VIN number JTHCE1D2X65012653;
2. \$ 38,624 in U.S. Currency seized on January 25, 2021 from the defendant;
GIOVANNI JAVIER NAZARIO CALDERON, at 2411 Bentzen Circle Apt.
B-34, Anchorage, AK;

3. Draco 7.62x39mm AK Pistol, ammunition, and magazines – serial number PMD-06209-18 RO;
4. Glock 30 Gen 4 (.45), ammunition, and magazine – serial number XRK540;
5. Glock 19 Gen 4 (9mm) and magazines – serial number YTC046 and magazines – (stolen handgun) in 2411 Bentzen Circle Apt. B-34, Anchorage, AK; and
6. Glock 19 Gen 4 (9MM) (dark earth color) and magazines – serial number VBB226 (stolen handgun) in 1055 W 27th Ave Apt 319, Anchorage, AK.

All pursuant to 21 U.S.C. § 853(a)(1) and (2), 28 U.S.C. § 2461(c), and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Kyle Reardon for
STEPHAN A. COLLINS
Assistant U.S. Attorney
United States of America

s/ Bryan Schroder
BRYAN SCHRODER
United States Attorney
United States of America

DATE: February 16, 2021